Message

From: Jeffrey H Birk [jeffrey.birk@basf.com]

Sent: 8/18/2020 8:37:30 PM

To: Meadows, Sarah [Meadows.Sarah@epa.gov]

CC: Schmid, Emily [Schmid.Emily@epa.gov]; Kenny, Daniel [Kenny.Dan@epa.gov]

Subject: RE: BAS 183 35 H wind tunnel_summary.xlsx

Attachments: BAS 183 35 H wind tunnel_summary.xlsx; BAS 183 35 H vs Engenia drift and volatility comparisons 8-17-20.pptx

All,

I tried to remove the protection so you can view these files. I'll work on getting them submitted through the front end.

Let me know if you still cannot open the files and I'll go back to the originators and ask them to unprotect the files.

Thanks,

Jeff

JEFFREY BIRK

Product Registration Manager

Phone: +1 919 547-2622, Mobile: +1-919-225-9220, Fax: +1 919 547-2850, Email: jeffrey.birk@basf.com Postal Address: BASF Corporation, , 26 Davis Drive, 27709-3528 Research Triangle Park, United States



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From: Meadows, Sarah < Meadows. Sarah@epa.gov>

Sent: Tuesday, August 18, 2020 3:30 PM **To:** Jeffrey H Birk <jeffrey.birk@basf.com>

Cc: Schmid, Emily <Schmid.Emily@epa.gov>; Kenny, Daniel <Kenny.Dan@epa.gov>

Subject: RE: BAS 183 35 H wind tunnel summary.xlsx

Hi, Jeff. Can you please submit this data through the front end so it can be MRIDed and put in our system for tracking purposes? I'll go ahead and forward this courtesy copy to the EFED team.

Thanks,

Sarah

From: Kenny, Daniel < Kenny. Dan@epa.gov > Sent: Tuesday, August 18, 2020 2:19 PM

To: Meadows, Sarah < Meadows.Sarah@epa.gov>; Hathaway, Margaret < Hathaway, Margaret@epa.gov>; Crawford,

Lydia Crawford.Lydia@epa.gov; Schmid, Emily Schmid.Emily@epa.gov>

Subject: FW: BAS 183 35 H wind tunnel_summary.xlsx

From: Jeffrey H Birk < jeffrey.birk@basf.com >
Sent: Monday, August 17, 2020 11:53 AM
To: Kenny, Daniel < Kenny.Dan@epa.gov >
Cc: Schmid, Emily < Schmid.Emily@epa.gov >
Subject: BAS 183 35 H wind tunnel_summary.xlsx

Dan,

As we discussed last week, I am providing the wind tunnel data that confirms that BAS 183 35 H herbicide (BAS 183 CTH) performs at least as well as Engenia with regard to physical drift potential, based upon the established wind tunnel testing standards for Engenia herbicide.

The attached data results include several other tank mix combinations with both Engenia and BAS 183 35 H. Although this comparison is not necessary it further demonstrates that BAS 183 35 H will perform similar to Engenia when tank mixed with other herbicides and/or a DRA like Intact.

As a reference both Outlook herbicide and Select Max herbicide are formulated as Emulsifiable Concentrates (EC) which are known to potentially reduce the spray droplet size. Similar to Engenia, BAS 183 35 H fails when tank mixed with either Outlook or Select Max, but like Engenia, it passes when the DRA, Intact is added to the tank mix.

Overall the submitted data clearly demonstrates, that BAS 183 35 H herbicide performs equal to or slightly better than Engenia, under the required wind tunnel testing conditions.

Please share this data with EFED and let me know if they have any questions.

Thanks.

Jeff